REMARKS

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 1-26 are currently pending. Claims 1-16 and 22-26 have been amended by the present amendment. The changes to the claims are supported by the originally filed specification and do not add new matter.

In the outstanding Office Action, Claims 1-26 were rejected under 35 U.S.C. § 103(a) as being anticipated by U.S. Patent 5,951,684 to Jeon (hereinafter "the '684 patent") in view of U.S. Patent No. 6,003,097 to Richman et al. (hereinafter "the '097 patent").

Amended Claim 1 is directed to a method of monitoring an image-printing device connected to a network by a monitoring device, comprising: (1) realizing a location of the image-printing device within the network; (2) updating in a first database the location of the image-printing device; (3) querying the image-printing device for an identity of a manufacturer of the image-printing device; (4) updating in the first database the manufacturer of the image-printing device, if the querying for the identity of the manufacturer of the image-printing device is successful; (5) querying the image-printing device, utilizing the identity of the manufacturer of the image-printing device, for the identity of the model of the image-printing device, if the querying of the image-printing device for the identity of the manufacturer of the image-printing device is successful; (6) updating in the first database the identity of the model of the image-printing device, if the query for the identity of the model of the image-printing device is successful; and (7) establishing a communication means for the image-printing device according to information stored in the first database. Claim 1 has been amended to clarify that the image-printing device is connected to a network. The changes to Claim 1 are supported by the originally filed specification and do not add new matter.

The '684 patent is directed to a method of booting a computer system while identifying a type of CD-ROM disk drive of the computer system. As shown in Figure 2, the '684 patent discloses a method in which a port on which a CD-ROM drive is mounted is detected using CMOS setup information, and information stored in a memory of the CD-ROM disk drive is read and compared with information stored internally to determine the type of CD-ROM disk drive. However, Applicants respectfully submit that the '684 patent fails to disclose (1) realizing a location of an image-printing device within a network; (2) updating in a first database the manufacturer of the image-printing device if the identity of the manufacturer was successfully queried in the image-printing device; and (3) querying the image-printing device, utilizing the identity of the manufacturer of the image-printing device, for the identity of a model of the image-printing device, if the querying of the image-printing device for the identity of the manufacturer of the image-printing device was successful, as recited in amended Claim 1.

First, it is unclear to Applicants how the '684 patent is directed to either an image-forming device or an image-printing device. Further, Applicants respectfully submit that the '684 patent fails to disclose the conditional steps recited in Claim 1. For example, the updating step recited in Claim 1 is performed if the querying of the image-printing device for the identity of the manufacturer of the image-printing device is successful. Applicants respectfully submit that the '684 patent fails to disclose this conditional step. Further, the second querying step recited in Claim 1 is performed if the querying of the image-forming device for the identity of the manufacturer of the image-printing device is successful. Applicants respectfully submit that the '684 patent fails to teach to suggest this conditional step. Further, Applicants note that the second updating step recited in Claim 1 is performed if the query for the identity of the model of the image-printing device is successful. Applicants respectfully submit that the '684 patent fails to disclose this conditional step. Rather, the

'684 patent is directed to determining a type of CD-ROM within a computer system. In this regard, Applicants note that the '684 patent discloses an information list stored in association with a repairing program, which includes file names of the device driver for each CD-ROM disk drive model and CD-ROM disk drive manufacturer.[1] However, Applicants respectfully submit that the '684 patent fails to disclose querying an image-printing device for the identity of a manufacturer and querying the image-printing device, using the identity of the manufacturer, for the model of the device if the step of querying an image-printing device for the identity of the manufacturer was successful, as recited in amended Claim 1. The '684 patent fails to disclose the conditional steps recited in Claim 1.

The '097 patent is directed to a system for configuring a network adapter of a computer without user intervention. In particular, the '097 patent discloses a system in which a device can be detected on a system bus and thereafter be assigned a device identification code that identifies the particular device as being connected to the selected system bus.[2] Further, the '097 patent discloses that the device information can be stored in the computer memory in a tree-like structure of device nodes.[3] Moreover, the '097 patent discloses that the detection process requires that a device enter an inactive state, thereby disabling the function of the device, prior to the detection of the device on the system bus.[4] Thereafter, a device identification code is assigned to the detected device, wherein the device identification code is a string of ASCII characters that uniquely identifies the particular device. However, Applicants respectfully submit that the '097 patent fails to disclose the querying and updating steps recited in amended Claim 1. In particular, Applicants respectfully submit that the conditional nature of the claimed querying and updating steps is not disclosed by the '097 patent. For example, the '097 patent does not disclose that the image-printing device is

[1] See '684 patent, column 4, lines 50-59.
[2] See '097 patent, column 4, lines 32-35.
[3] *Id.*, column 4, lines 42-47.
[4] *Id.*, column 7, lines 52-65.

queried for the model of the image-printing device if the manufacturer of the image-printing device was successfully obtained in a query of the image-printing device, as recited in Claim 1. Rather, the '097 patent merely discloses that devices that are in an inactive state are detected on a system bus and a unique identification code is assigned to the detected device.

Thus, no matter how the teachings of the '684 and '097 patents are combined, the combination does not teach or suggest the updating and querying steps recited in amended Claim 1. Accordingly, Applicants respectfully submit that the rejection of Claim 1 (and dependent Claims 2-21) is rendered moot by the present amendment to Claim 1. Thus, Applicants respectfully submit that Claim 1 (and dependent Claims 2-21) patentably define over any proper combination of the '684 and '097 patents.

Independent Claims 22-26 recite limitations analogous to the limitations recited in amended Claim 1. Moreover, Claims 22-26 have been amended in a manner analogous to the amendment to Claim 1. Accordingly, for the reasons stated above for the patentability of Claim 1, Applicants respectfully submit that the rejections of Claims 22-26 are rendered moot by the present amendment to those claims.

Thus, it is respectfully submitted that independent Claims 1 and 22-26 (and all associated dependent claims) patentably define over any proper combination of the '864 and '097 patents.

Consequently, in view of the present amendment and in light of the above discussion, the outstanding grounds for rejection are believed to have been overcome. The application as amended herewith is believed to be in condition for formal allowance. An early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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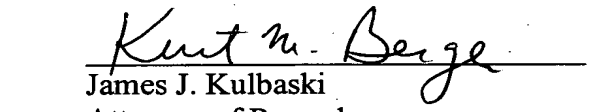

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